

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL McCARTHY, et al.

Plaintiffs,

v.

CHARLES D. BAKER, in his Official Capacity as
Governor of the Commonwealth of Massachusetts
and in his Individual Capacity;
et al.

Defendants.

CONSOLIDATED ACTIONS

CIVIL ACTION
NO. 1:20-cv-10701-DPW

CEDRONE, LLC d/b/a SHAWSHEEN
FIREARMS; et al.

Plaintiffs,

v.

CHARLES DUANE BAKER, in his capacity as
GOVERNOR OF THE COMMONWEALTH OF
MASSACHUSETTS; and MAURA T. HEALEY,
in her capacity as ATTORNEY GENERAL OF
THE COMMONWEALTH OF
MASSACHUSETTS,

Defendants.

CIVIL ACTION
NO. 1:20-cv-40041-DPW

**COMMONWEALTH DEFENDANTS' ASSENTED TO MOTION FOR LEAVE TO FILE
CONSOLIDATED MEMORANDUM IN EXCESS OF PAGE LIMITATION**

Defendants, Governor Baker, Attorney General Healey, and Commissioners Bharel and Gagnon (the “Commonwealth Defendants”), respectfully move this Court for leave to file one consolidated brief of up to thirty (30) pages in opposition to Plaintiffs’ two motions for interlocutory injunctive relief pending in these consolidated cases. In support of this motion, Defendants state the following:

1. These two matters have been consolidated by Order of Court. [*McCarthy* Doc. No. 30, *Cedrone* Doc. No. 11.]
2. The Plaintiffs in both actions seek interlocutory injunctive relief and have filed separate briefs and other papers in support of same.
3. Portions of the relief sought and the Plaintiffs’ arguments in support of interlocutory injunctive relief in the two cases significantly overlap.
4. Filing a consolidated brief that covers the interlocutory injunctive relief sought in both matters would be more efficient than filing a brief in each case that covers substantially the same arguments. To the extent that certain arguments are made by one set of Plaintiffs but not the other, Defendants will attempt to so note.
5. As set forth in Local Rule 7.1(b)(4), there is a twenty-page limit to memoranda opposing motions, except with leave of Court.
6. The Commonwealth Defendants seek leave to file a consolidated brief of up to thirty (30) pages. This limit is ten pages less than the Defendants would be entitled to file if the brief were not consolidated.
7. All parties assent to this motion.

WHEREFORE the Commonwealth Defendants respectfully request that the Court grant this motion for leave to file a single consolidated Opposition covering both cases that is in excess of the twenty-page limit.

Respectfully submitted,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Gary Klein
Gary Klein
Special Assistant Attorney General
One Ashburton Place
Boston, Massachusetts 02108
(617) 651-3650
Gary.Klein@state.ma.us

Julie Kobick
Assistant Attorney General
Office of the Massachusetts Attorney General
One Ashburton Place
Boston, Massachusetts 02108
(617) 963-2559
julia.kobick@mass.gov

Dated: April 22, 2020

LOCAL RULE 7.1 CERTIFICATE

I certify pursuant to Local Rule 7.1(a)(2) that all parties assent to the requested relief.

/s/ Gary Klein
Gary Klein

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Gary Klein
Gary Klein